

<u>107a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Lumber and other construction materials for the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>107b</u>	<u>MGL Ch 268A</u>	Check No. 1570 for \$8,200.00 on or about 10/03/97	
<u>107c</u>	<u>18 USC 201</u>		
<u>107d</u>	<u>MGL Ch 268A</u>		
<u>108a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Lumber and other construction materials for the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>108b</u>	<u>MGL Ch 268A</u>	Check No. 1580 for \$11,600.00 on or about 10/12/97	
<u>108c</u>	<u>18 USC 201</u>		
<u>108d</u>	<u>MGL Ch 268A</u>		
<u>109a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Labor for the framing of the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>109b</u>	<u>MGL Ch 268A</u>	Check No. 1579 for \$12,400.00 on or about 10/14/97	
<u>109c</u>	<u>18 USC 201</u>		
<u>109d</u>	<u>MGL Ch 268A</u>		
<u>110a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Fireplace and brickwork at the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>110b</u>	<u>MGL Ch 268A</u>	Check Nos. 1599 and 1606 totaling \$6,000.00 on or about 11/13/97 and 11/16/97	
<u>110c</u>	<u>18 USC 201</u>		
<u>110d</u>	<u>MGL Ch 268A</u>		
<u>111a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Four double hung windows at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
<u>111b</u>	<u>MGL Ch 268A</u>	Check No. 1604 for \$1,154.05 on or about 11/16/97	
<u>111c</u>	<u>18 USC 201</u>		
<u>111d</u>	<u>MGL Ch 268A</u>		
<u>112a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Lumber and other construction materials for the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>112b</u>	<u>MGL Ch 268A</u>	Check No. 1615 for \$7,925.00 on or about 12/01/97	
<u>112c</u>	<u>18 USC 201</u>		
<u>112d</u>	<u>MGL Ch 268A</u>		
<u>113a</u>	<u>18 USC 201</u>	P.J. Richfield, Inc.	Lumber and other construction materials for the new residence of defendants JOSEPH and MELINDA ASSELIN
<u>113b</u>	<u>MGL Ch 268A</u>	Check No. 1630 for \$3,900.00 on or about 12/17/97	
<u>113c</u>	<u>18 USC 201</u>		
<u>113d</u>	<u>MGL Ch 268A</u>		

All in violation of Title 18, United States Code, Section

201 and Title 18, United States Code, Section 2.

Racketeering Acts 114 through 121

41. Racketeering Acts 114 through 121 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,**

defendants herein, public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from John Spano, d/b/a Valley Floor Covering, Inc., all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to John Spano, d/b/a Valley Floor Covering, Inc., all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from John Spano, d/b/a Valley Floor Covering, Inc., in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to John Spano, d/b/a Valley Floor Covering, Inc., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3);

c. On or about the following dates, in the District of Massachusetts,

JOHN SPANO,

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to a public official, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, all with the intent to influence an official act of said public official; to influence said public official to commit and to aid in committing, and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and to induce said public official to do and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to John Spano, d/b/a Valley Floor Covering, Inc., all in violation of Title 18, United States Code, Sections 201(b)(1)(A), (B), and (C);

d. On or about the following dates, in the Commonwealth of Massachusetts,

JOHN SPANO,

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to any state employee, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, with intent to influence any official act or any act within the official responsibility of said state employee; to influence said state employee to commit and aid in committing, and to collude in, and allow, any fraud, and make opportunity for the commission

of any fraud on the Commonwealth and on a state, county or municipal agency; and to induce said state employee to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to John Spano, d/b/a Valley Floor Covering, Inc., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(a)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a, b, c and d and Date</u>	<u>Beneficiary of Act a, b, c and d</u>
114a	18 USC 201	Free carpeting and installation services in or about 1993	Living room, hallway, and bedroom carpeting at the residence of defendant ASSELIN, JR.
114b	MGL Ch 268A		
114c	18 USC 201		
114d	MGL Ch 268A		
115a	18 USC 201	Free carpeting and installation services in or about the fall, 1996	Living room, hallway, and television room carpeting at the residence of defendants CHRISTOPHER and MERYLINA ASSELIN
115b	MGL Ch 268A		
115c	18 USC 201		
115d	MGL Ch 268A		
116a	18 USC 201	Free carpeting and installation services in or about 1998	Carpets at the residence of defendants JOSEPH and MELINDA ASSELIN
116b	MGL Ch 268A		
116c	18 USC 201		
116d	MGL Ch 268A		
117a	18 USC 201	Free carpeting and installation services in or about 1998	Carpets at the residence of defendants RAYMOND and JANET ASSELIN, SR.
117b	MGL Ch 268A		
117c	18 USC 201		
117d	MGL Ch 268A		

<u>118a</u>	<u>18 USC 201</u>	Approximately \$2,900.00 worth of free carpeting and installation services in or about the summer, 2000	Carpets at the residence of SHA's Chief Purchasing Agent
<u>118b</u>	<u>MGL Ch 268A</u>		
<u>118c</u>	<u>18 USC 201</u>		
<u>118d</u>	<u>MGL Ch 268A</u>		
<u>119a</u>	<u>18 USC 201</u>	Free carpeting and installation services in or about 2001	Office carpet at the office of defendant CHRISTOPHER ASSELIN
<u>119b</u>	<u>MGL Ch 268A</u>		
<u>119c</u>	<u>18 USC 201</u>		
<u>119d</u>	<u>MGL Ch 268A</u>		
<u>120a</u>	<u>18 USC 201</u>	Approximately \$2,295.00 worth of free carpeting and installation services on or about 03/09/01	Carpets at the residence of defendants JOSEPH and MELINDA ASSELIN, and the rental property of defendant SOTIRION
<u>120b</u>	<u>MGL Ch 268A</u>		
<u>120c</u>	<u>18 USC 201</u>		
<u>120d</u>	<u>MGL Ch 268A</u>		
<u>121a</u>	<u>18 USC 201</u>	Free carpeting and installation services in or about the summer, 2002	Basement, hall, and staircase carpeting at 56 Stage Island Road, Chatham, MA
<u>121b</u>	<u>MGL Ch 268A</u>		
<u>121c</u>	<u>18 USC 201</u>		
<u>121d</u>	<u>MGL Ch 268A</u>		

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

Racketeering Acts 122 through 133

42. Racketeering Acts 122 through 133 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,**

defendants herein, public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from Paul Bannick d/b/a

PABCO and Paul A. Bannick Co., all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Paul Bannick d/b/a PABCO and Paul A. Bannick Co., all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from Paul Bannick d/b/a PABCO and Paul A. Bannick Co., in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude

in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Paul Bannick d/b/a PABCO and Paul A. Bannick Co., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3);

c. On or about the following dates, in the District of Massachusetts,

PAUL BANNICK,

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to a public official, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, all with the intent to influence an official act of said public official; to influence said public official to commit and to aid in committing, and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and to induce said public official to do and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment

during the terms of contracts to Paul Bannick d/b/a PABCO and Paul A. Bannick Co., all in violation of Title 18, United States Code, Sections 201(b)(1)(A), (B), and (C);

d. On or about the following dates, in the Commonwealth of Massachusetts,

PAUL BANNICK,

defendant herein, did directly and indirectly corruptly give, offer, and promise anything of value to any state employee, that is defendants RAYMOND ASSELIN, SR. and ARTHUR SOTIRION, with intent to influence any official act or any act within the official responsibility of said state employee; to influence said state employee to commit and aid in committing, and to collude in, and allow, any fraud, and make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and to induce said state employee to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Paul Bannick d/b/a PABCO and Paul A. Bannick Co., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(a)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	Thing of Value for Act a, b, c and d and Date	Beneficiary of Act a, b, c and d
122a	18 USC 201	Paul A. Bannick Co.,	Cash to defendant
122b	MGL Ch 268A	Check No. 16062 to	SOTIRION
122c	18 USC 201	Paul A. Bannick for	
122d	MGL Ch 268A	\$100.00 on or about 04/11/96	
123a	18 USC 201	Paul A. Bannick Co.,	Cash to defendant
123b	MGL Ch 268A	Check No. 16201 to	SOTIRION
123c	18 USC 201	Paul A. Bannick for	
123d	MGL Ch 268A	\$300.00 on or about 08/21/96	
124a	18 USC 201	Paul A. Bannick Co.,	Cash to defendant
124b	MGL Ch 268A	Check No. 16243 to	SOTIRION
124c	18 USC 201	Paul A. Bannick for	
124d	MGL Ch 268A	\$100.00 on or about 10/03/96	
125a	18 USC 201	Paul A. Bannick Co.,	Cash to defendant
125b	MGL Ch 268A	Check No. 16280 to	SOTIRION
125c	18 USC 201	Paul A. Bannick for	
125d	MGL Ch 268A	\$300.00 on or about 11/14/96	
126a	18 USC 201	Paul A. Bannick Co.,	Golf club for
126b	MGL Ch 268A	Check No. 16326 for	defendant ASSELIN, SR.
126c	18 USC 201	\$235.29 on or about	
126d	MGL Ch 268A	12/13/96	
127a	18 USC 201	Paul A. Bannick Co.,	Cash to defendant
127b	MGL Ch 268A	Check No. 16366 to	SOTIRION
127c	18 USC 201	Paul A. Bannick for	
127d	MGL Ch 268A	\$100.00 on or about 01/28/97	
128a	18 USC 201	Cash payment approxi-	Cash to defendant
128b	MGL Ch 268A	mately every two	ASSELIN, SR. and
128c	18 USC 201	months by Paul Bannick	defendant SOTIRION
128d	MGL Ch 268A	during the calendar	
		year 1999	
129a	18 USC 201	Paul A. Bannick Co.	Partial payment for
129b	MGL Ch 268A	Check No. 17024 for	an overhead door at
129c	18 USC 201	\$800.00 on or about	the residence of
129d	MGL Ch 268A	01/07/99	defendant SOTIRION

130a	18 USC 201	Cash payments approximately every two months by Paul Bannick during the calendar year 2000	Cash to defendant ASSELIN, SR. and defendant SOTIRION
130b	MGL Ch 268A		
130c	18 USC 201		
130d	MGL Ch 268A		
131a	18 USC 201	Cash payments approximately every two months by Paul Bannick during the calendar year 2001	Cash to defendant ASSELIN, SR. and defendant SOTIRION
131b	MGL Ch 268A		
131c	18 USC 201		
131d	MGL Ch 268A		
132a	18 USC 201	Cash payments approximately every two months by Paul Bannick during the calendar year 2002	Cash to defendant ASSELIN, SR. and defendant SOTIRION
132b	MGL Ch 268A		
132c	18 USC 201		
132d	MGL Ch 268A		
133a	18 USC 201	SHA Check No. 043541 for \$6,285.60 to Paul A. Bannick Co. falsely inflated by approximately \$3,000.00	Proceeds for free gifts for the 2002 "Committee to Elect Christopher Asselin" golf fundraiser
133b	MGL Ch 268A		
133c	18 USC 201		
133d	MGL Ch 268A		

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

Racketeering Acts 134 through 138

43. Racketeering Acts 134 through 138 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,**

defendants herein, public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from Oak Pond Farms, Inc.,

all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Oak Pond Farms, Inc., all in violation of Title 18, United States Code, Sections 201(b) (2) (A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, each being a state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from Oak Pond Farms, Inc., in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and

being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to Oak Pond Farms, Inc., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b) (1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a and b and Date</u>	<u>Beneficiary of Act a and b</u>
134a 134b	18 USC 201 MGL Ch 268A	Oak Pond Farms, Inc. Check No. 1455 for \$20,500.00 on or about 10/07/96	Purchase of a 1996 Plymouth Voyager Van for defendant JAMES ASSELIN
135a 135b	18 USC 201 MGL Ch 268A	Oak Pond Farms, Inc. Check No. 1456 for \$1,105.00 on or about 10/08/96	Excise taxes on the 1996 Plymouth Voyager Van purchased for defendant JAMES ASSELIN
136a 136b	18 USC 201 MGL Ch 268A	Oak Pond Farms, Inc. Check No. 1458 for \$3,000.00 on or about 12/23/96	Automobile insurance on the 1996 Plymouth Voyager Van purchased for defendant JAMES ASSELIN
137a 137b	18 USC 201 MGL Ch 268A	William Pappas Personal Check No. 1456 for \$52,500.00 to defendant JOSEPH ASSELIN on or about 04/28/97	Funding for purchase of property at 518 Old Farm Road, Amherst, MA for defendants JOSEPH and MELINDA ASSELIN
138a 138b	18 USC 201 MGL Ch 268A	Fleet Bank Cashier's Check Nos. 20794638 and 2079564 for \$14,000.00 to A & S Boats on or about 06/26/00	Partial payment towards the purchase of twenty-three foot Chaparral 235SSi boat for the Asselin family

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

Racketeering Acts 139 through 143

44. Racketeering Acts 139 through 143 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, each being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from M & D Remodeling, Inc., all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to M & D Remodeling, Inc., all in violation of Title 18, United States Code, Sections 201(b) (2) (A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, each being a state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from M & D Remodeling, Inc., in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to M & D Remodeling, Inc., all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a and b and Date</u>	<u>Beneficiary of Act a and b</u>
139a	18 USC 201	M & D Remodeling	Landscaping work at
139b	MGL Ch 268A	Check No. 2469 for \$475.00 on or about 04/24/01	the residence of defendant SOTIRION

<u>140a</u> <u>140b</u>	<u>18 USC 201</u> MGL Ch 268A	M & D Remodeling Check No. 2487 for \$450.00 on or about 05/26/01	Landscaping work at the residence of defendants RAYMOND and JANET ASSELIN, SR.
<u>141a</u> <u>141b</u>	<u>18 USC 201</u> MGL Ch 268A	M & D Remodeling Check No. 2536 for \$335.00 on or about 08/02/01	Landscaping work at the residence of defendant SOTIRION
<u>142a</u> <u>142b</u>	<u>18 USC 201</u> MGL Ch 268A	M & D Remodeling Check No. 2695 for \$330.00 on or about 11/05/01	Landscaping work at the residence of defendant SOTIRION
<u>143a</u> <u>143b</u>	<u>18 USC 201</u> MGL Ch 268A	M & D Remodeling Check No. 2281 for \$1,040.00 on or about 05/21/02	Landscaping work at the residence of defendant SOTIRION

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

Racketeering Acts 144 through 150

45. Racketeering Acts 144 through 150 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

RAYMOND ASSELIN, SR.

and

ARTHUR SOTIRION,

defendants herein, each being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from a minority SHA contractor, all in return for and with the intent of being influenced in the performance of an official act; being

influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to said minority SHA contractor, all in violation of Title 18, United States Code, Sections 201(b) (2) (A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, each being a state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from a minority SHA contractor, in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in

violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to said minority SHA contractor, all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3):

<u>Act</u>	<u>Violation</u>	<u>Thing of Value for Act a and b and Date</u>	<u>Beneficiary of Act a and b</u>
144a 144b	18 USC 201 MGL Ch 268A	Cash payments at least once a month during the calendar year 1998	Cash to defendant ASSELIN, SR. and defendant SOTIRION
145a 145b	18 USC 201 MGL Ch 268A	Cash payments at least once a month during the calendar year 1999	Cash to defendant ASSELIN, SR. and defendant SOTIRION
146a 146b	18 USC 201 MGL Ch 268A	Cash payments at least once a month during the calendar year 2000	Cash to defendant ASSELIN, SR. and defendant SOTIRION
147a 147b	18 USC 201 MGL Ch 268A	Cash payments at least once a month during the calendar year 2001	Cash to defendant ASSELIN, SR. and defendant SOTIRION
148a 148b	18 USC 201 MGL Ch 268A	Cash payments at least once a month during the calendar year 2002	Cash to defendant ASSELIN, SR. and defendant SOTIRION
149a 149b	18 USC 201 MGL Ch 268A	Hilltop Construction, Inc. Check No. 3414 for \$27,300.00 on or about 06/21/02	Payment related to the purchase of CHI Insurance Agency, Inc. by defendant JOSEPH ASSELIN

150a	18 USC 201	Hilltop Construction, Inc. Check No. 3441 for \$24,300.00 on or about 07/11/02	Payment related to the purchase of CHI Insurance Agency, INC. by defendant JOSEPH ASSELIN
150b	MGL Ch 268A		

All in violation of Title 18, United States Code, Section 201 and Title 18, United States Code, Section 2.

Racketeering Acts 151 through 153

46. Racketeering Acts 151 through 153 consisted of the following:

a. On or about the following dates, in the District of Massachusetts,

**RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,**

defendants herein, each being a public official, did directly and indirectly corruptly demand, seek, receive, accept, and agree to receive and accept the following things of value from a salesman for a window company, all in return for and with the intent of being influenced in the performance of an official act; being influenced to commit and aid in committing and to collude in, and allow, a fraud, and to make opportunity for the commission of a fraud; and being influenced to act and omit to do an act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to said window company,

all in violation of Title 18, United States Code, Sections 201(b)(2)(A), (B), and (C) and Title 18, United States Code, Section 2;

b. On or about the following dates, in the Commonwealth of Massachusetts,

RAYMOND ASSELIN, SR.
and
ARTHUR SOTIRION,

defendants herein, each being a state employee, did directly and indirectly corruptly ask, demand, exact, solicit, seek, accept, receive, and agree to receive for himself and other persons and entities the following things of value from a salesman for a window company, in return for being influenced in the performance of any official act or act within his official responsibility; being influenced to commit and aid in committing and to collude in, and allow any fraud, and to make opportunity for the commission of any fraud on the Commonwealth and on a state, county or municipal agency; and being induced to do and omit to do any act in violation of his official duty; that is, to fraudulently generate bid proposals, collude in the preparation of bid proposals, award contracts, steer sub-contracts and otherwise provide preferential treatment during the terms of contracts to the window company, all in violation of Massachusetts General Laws, Chapter 268A, Sections 2(b)(1), (2) and (3):